

REMARKS

Claims 1-26 are pending in the application. Claims 1, 9 and 22 are the independent claims. Claims 1-26 stand rejected.

Claim Rejections – 35 USC § 102

Claim 1 stands rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by McConnell et al. U.S. Patent No. 6,993,475. Applicant submits that McConnell fails to teach or suggest generating “a collection of *ranked interpretations* comprising a set of fragments of data types *structurally compatible* to data types in the received inputs ” (emphasis added) as recited in claim 1. For example, “[t]he underlying structure of the type may be used to determine which fragments are compatible and thus are combined”, (Application at paragraph [0044]) and “a first term could mean two different things expressed in two different types, the fact that a second term in the request refers to the first type may be used to divine that the first term also refers to the first type.”(Application at paragraph [0045]). The portion of McConnell cited by the Examiner teaches generating for each word “a clique (or set) of pattern objects (or a group of rank ordered fragments).” (McConnell at col. 19, 65 – 67 and col. 20, col. 1). Since McConnell fails to teach or suggest at least the above referenced portion of claim 1, Applicant respectfully requests reconsideration to the rejection of claim 1.

Insomuch as claims 2 – 8 depend directly or indirectly from claim 1 they too patentably define over McConnell. Accordingly, Applicant respectfully requests reconsideration to the rejections of claims 2 – 8.

Independent claim 9 stands rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by McConnell et al. Applicant submits that claim 9 includes similar elements to that of claim 1 and patentably defines over McConnell for at least the same reasons with respect to claim 1.

Moreover independent claim 9 recites “generating a *plurality* of ranked interpretations comprising a set of fragments of data types structurally compatible to data types in the request ... [and] performing an action in response to *at least one of the plurality of ranked interpretations*.” (emphasis added). “A claim is anticipated only if each and every element as

set forth in the claim is found, expressly or inherently described, in a single prior art reference.” *Verdegall Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicant respectfully submits that McConnell fails to teach or suggest “generating a *plurality* of ranked interpretations comprising a set of fragments of data types structurally compatible to data types in the request ... [and] performing an action in response to *at least one of the plurality of ranked interpretations*.” (emphasis added). Accordingly, Applicant respectfully requests reconsideration of the rejection to claim 9.

Insomuch as claims 10 – 21 depend directly or indirectly from claim 9 they too patentably define over McConnell. Accordingly, Applicant respectfully requests reconsideration to the rejections of claims 10 – 21.

Independent claim 22 stands rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by McConnell et al. Applicant submits that McConnell fails to teach or suggest at least “assigning a rank to the at least one interpretation.” In the Office Action, the Examiner stated that col. 42 lines 42 – 45 teach the above mentioned claim limitation. (See Office Action dated June 5, 2007 at page 7).

Reproduced below is the text from col. 42 lines 42 – 50:

As shown in step 1230, the groups of rank ordered fragments are "chained" so that a formal command query may be generated for interpretation by the database management process 470. Basically, the chaining process combines the groups of rank ordered fragments in a way consistent with the annotated database design schema 420 (e.g., the annotated ERD). Once the groups of rank ordered fragments are combined, the objects of the resulting "fragment" can be easily converted to a formal command query.

Applicant respectfully submits that col. 42 lines 42 – 45 fail to teach or suggest “assigning a rank to the at least one interpretation.” Applicant submits that the portion of McConnell reproduced above discloses generating a query for interpretation by the database by combining “the groups of rank ordered fragments in a way consistent with the annotated database design schema [and] ... [o]nce the groups of rank ordered fragments are combined, the objects of the resulting "fragment" can be easily converted to a formal command query”,

DOCKET NO.: MSFT-3513/302456.01
Application No.: 10/822,499
Office Action Dated: June 5, 2007

**PATENT
REPLY FILED UNDER EXPEDITED
PROCEDURE PURSUANT TO
37 CFR § 1.116**

however Applicant submits that this portion of McConnell fails to teach or suggest assigning a rank to at least one *interpretation* as recited in the claims. Accordingly, Applicant respectfully requests reconsideration of the rejection to claim 22.

Insomuch as claims 23 – 26 depend directly or indirectly from claim 22 they too patentably define over McConnell. Accordingly, Applicant respectfully requests reconsideration to the rejections of claims 23 – 26.

CONCLUSION

In the view of the foregoing amendments and remarks, Applicants respectfully submit that the present application is in condition for allowance. Reconsideration of the application and an early Notice of Allowance are respectfully requested. In the event that the Examiner cannot allow the application for any reason, the Examiner is encouraged to contact Applicants' representative.

Date: August 6, 2007

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